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13 *Marsha Johns and Karen Gedney*

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15  
16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 J. BENJAMIN ODOMS,  
19 Plaintiff,  
20 vs.  
21 ROMEO ARANAS, et al.,  
22 Defendants.

Case No. 3:16-cv-00159-MMD-VPC

23 **MOTION FOR EXTENSION OF TIME TO**  
24 **FILE RESPONSIVE PLEADING**

25 Defendants, Dr. Marsha Johns and Dr. Karen Gedney, by and through counsel, Adam Paul  
26 Laxalt, Attorney General of the State of Nevada, and Ian E. Carr, Deputy Attorney General, hereby  
27 submit their Motion for Extension of Time to File a Responsive Pleading. This Motion is based on  
28 Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and  
all papers and pleadings on file in this action.

29 **MEMORANDUM OF POINTS AND AUTHORITIES**

30 **I. ARGUMENT**

31 Defendants respectfully request a thirty (30) day extension of time out from the current deadline  
32 (May 29, 2018) to file a responsive pleading in this case. Counsel for Defendants is confronted with  
33 numerous competing deadlines and a high workload due to staffing changes in the Office of the  
34 Attorney General. Furthermore, defense counsel has a jury trial before United States District Judge  
35 Robert C. Jones scheduled to begin on June 4, 2018 in the case of *Campbell v. Portillo*, 3:11-cv-00532-  
36 RCJ-VPC. The trial is anticipated to last four to five days, not including deliberations. However, such

1 obstacles are currently being resolved and the requested extension of time should afford Defendants  
2 adequate time to file a responsive pleading in this case.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

4 When an act may or must be done within a specified time, the court may,  
5 for good cause, extend the time: (A) with or without motion or notice if  
6 the court acts, or if a request is made, before the original time or its  
extension expires; or (B) on motion made after the time has expired if the  
party failed to act because of excusable neglect.

7 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case,  
8 but will allow for a thorough response to Plaintiff's allegations. The requested thirty (30) day extension  
9 of time should permit Defendants time to adequately research and respond to Plaintiff's allegations.  
10 Defendants assert that the requisite good cause is present to warrant the requested extension of time.

11 For these reasons, Defendants respectfully request a thirty (30) day extension of time from the  
12 current deadline to file a responsive pleading in this case, with a new deadline to and including  
13 Thursday, June 28, 2018.

14 DATED this 25th day of May, 2018.

15 ADAM PAUL LAXALT  
16 Attorney General

17 By: IAN E. CARR  
18 IAN E. CARR  
19 Deputy Attorney General  
20 State of Nevada  
21 Bureau of Litigation  
22 Public Safety Division

23 *Attorneys for Defendant Marsha Johns  
and Karen Gedney*

24 IT IS SO ORDERED.  
25 U.S. MAGISTRATE JUDGE

26 DATED: May 29, 2018

## **CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 25th day of May, 2018, I caused a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**, to be served, by U.S. District Court CM/ECF Electronic Filing on the following:

J. BENJAMIN ODOMS, #11978  
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**An employee of the  
Office of the Attorney General**